

## **State Water Quality Management Resource Model, ver. 5.1 (1/01)**

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### **Background: the Gap Analysis Effort**

States and EPA need consistent, high-quality information about the resource 'gap' facing State water quality management programs. In December 1998, EPA, States, and other interested stakeholders embarked on a joint effort to quantify the gaps in funding and staffing for these programs.

For the purposes of this effort, the 'gap' was defined as the difference between those resources currently available to State water quality management programs and the resources necessary to manage and implement State water quality management programs in a way that enables achievement of the environmental and public health goals of the Clean Water Act (CWA).

To develop this information within a short time-frame, the gap analysis was divided into two phases. Phase I consisted of the development of an initial, national estimate of the resource gap faced by State water quality management programs based on an extrapolation from data provided by 14 States. This phase of the gap analysis was completed in April 1999.

States and EPA established five objectives for Phase II of the gap analysis:

1. The development of a refined estimate of the resource gap, both for the nation and for individual States.
2. The identification of efficiencies that can be realized by State water quality management programs (i.e., methodologies that permit greater protection of the environment and public health at an equal or lower cost).
3. The development of a framework for setting priorities by linking staffing and resource needs to specific results (i.e., environmental, health, and/or economic benefits).
4. The development of an accurate, user-friendly model that can be used to estimate resource needs and document budget requests. This model must be flexible enough to cover State-specific programs and approaches, yet sufficiently structured to provide EPA with the information that it needs to develop and document a detailed national estimate of State resource needs.
5. The identification of successful ways to secure additional resources for water programs and to distribute the workload between Federal, State, and local authorities.

To achieve the fourth objective, EPA convened four focus group meetings between June and December of 1999. Based on these meetings, fourteen modules were developed. These modules have been integrated into the draft State Water Quality Management Resource Model. Each module focuses on a single program area within a complete State water quality management program (e.g., monitoring). The focus group participants (including State representatives, EPA HQ and Regional staff, and other concerned stakeholders) developed a list of the activities within each program area necessary to meet the objectives of the CWA. In addition, national defaults were developed by the focus groups for each line item.

A summary meeting was convened in February of 2000 to provide States with an opportunity to review the draft Model as a whole. Specifically, State representatives were asked to identify program areas or activities that may have been overlooked or, conversely, that may have been double counted. In addition, meeting participants were provided with a further opportunity to review the default estimates built into the Model as representative of an 'average' State.

EPA sees this model as an evolving tool and would greatly appreciate your comments on its structure and on the embedded defaults as new regulations are promulgated and evolving programs mature. The Model will be periodically reviewed and updated based on State comments and regulatory changes. Please submit all comments electronically on this website or by email to Kevin Scott of the Cadmus Group, Inc. at [kscott@cadmusgroup.com](mailto:kscott@cadmusgroup.com). All questions regarding model operation should also be directed to Kevin Scott.

## State Water Quality Management Resource Model, ver. 5.1 (1/01)

### Model Introduction

Welcome to the State Water Quality Management Resource Model. This model was developed as part of the Gap Analysis Effort sponsored by EPA's Office of Wastewater Management (OWM) and is designed to: (1) permit EPA to develop a national estimate of the resource needs faced by State water quality management programs, and (2) provide States with a flexible, yet nationally consistent, budget and planning tool.

The model is designed to maximize State flexibility. Therefore, it has been divided into 14 modules, each of which covers a single program area (e.g., water quality standards) and may stand alone if necessary. However, since the workload associated with many program areas is closely tied to the work completed in other program areas (e.g., if monitoring efforts increase, more data will be collected, requiring additional resources for data management activities), several modules rely on data stored in others. Each module was developed by a State-EPA focus group and distributed to State water quality administrators for review and comment. Thus, the default estimates built into the modules may not be appropriate for your program given its unique characteristics. Therefore, you may and should modify default estimates (stored in blue-shaded cells) as appropriate when you use this model to estimate your resource needs. Please read the operating instructions below for specific directions about proper model operation.

### Operating Instructions

The 14 modules of the State Water Quality Management Resource Model are:

- |                                |  |
|--------------------------------|--|
| - Permitting                   | - Coastal and Marine Waters            |
| - Compliance and Assistance    | - Monitoring                           |
| - Enforcement                  | - Reporting and Planning               |
| - Septage                      | - Water Quality Standards              |
| - NPS and Coastal NPS Controls | - CWSRF and other CWA Grant Management |
| - Total Maximum Daily Loads    | - Data Management                      |
| - Wetlands                     | - Regional Initiatives                 |

Buttons have been built into the model to permit you to navigate among the various worksheets of the model. These buttons are typically located at the bottom of each worksheet and are frequently accompanied by explanatory text to clarify their function. To activate a button, simply left-click on it and you will automatically be moved to the appropriate worksheet. Do not be alarmed if several screens flash after you activate a button; the model has been designed to automatically close inactive worksheets to prevent confusion.

As you move through the worksheets of the model, you will see that certain cells are shaded blue and contain white text. The values stored in these cells are the defaults developed by State-EPA focus groups for the *national* model.

**Important Note:** These default values represent the best estimates of focus group participants for an 'average,' or median State. Therefore, the appropriate values for these cells will likely be higher or lower for your State. For this reason, you should review all values stored in shaded cells and adjust them as necessary.

To make changes to a default value, left-click on the shaded cell (or move to the cell using the arrow keys) and enter the value appropriate for your State. For example, the default, average, fully-loaded salary for a full-time employee (FTE) for this module has been set at \$70,000 (see 'Main Menu' worksheet). If the average fully-loaded cost per FTE in your State is actually \$80,000, you should click on the cell and type '80000'. This change will then automatically cascade through the rest of the model.

An activity titled 'State-Specific Activities' has been built into each module to enable you to identify and enter the costs associated with the management (i.e., planning, coordination, tracking, etc.) of programs or activities unique to your State that are not captured elsewhere in the module. However, to prevent double-counting, please refer to the matrix of activities covered in the model prior to inputting a State-specific activity.

The model has the capability to forecast resource needs five years into the future. Therefore, once you have modified the workload estimates (as necessary) in a particular module, you will find two buttons at the bottom of the worksheet. These buttons are preceded by the question: "Will any of your inputs for this module change in future years?"

If you anticipate either higher or lower costs in the future based on anticipated State or federal regulations or on changes to the structure or operational practices of your office, click on the "Yes" button. You will automatically be taken to a worksheet for the next year on which you can make any necessary changes.

If the estimates that you have entered in the module will remain constant for the coming years, click the "No" button. The model will automatically calculate the resource needs for each future year, incorporating a factor to account for inflation. Once you click "No" the model will close the module and you will be returned to the Main Menu.

To view the five-year summary of the resource needs calculated for each module, click on the appropriate "Summary" button on the Main Menu. This will take you to the needs summary for that module. The "Full Model Summary" button will move you to a worksheet on which you may view the results from all 14 modules. Note that an add-on for special training needs is also calculated on this worksheet. As discussed above, all values stored in shaded cells may be adjusted by the user. Therefore, you may modify the magnitude of this add-on based on the characteristics of your program. It is hoped that this information may then be used to help with budgeting and planning for State's water quality management program.

You may print these instructions by clicking on the "Print Instructions" button at the bottom of this worksheet. Click on the "Main Menu" button to begin using the model.

\*\*\* Please contact Kevin Scott of the Cadmus Group, Inc. with any questions or comments about the State Water Quality Management Resource Model at (781) 434-2509 or [kscott@cadmusgroup.com](mailto:kscott@cadmusgroup.com). \*\*\*

## State Water Quality Management Resource Model, ver. 5.1 (1/01)

### General Assumptions

You may access all of the modules and reports built into the State Water Quality Management Resource Model from the menu located at the bottom of this worksheet. Clicking on one of the buttons below will take you to the associated module or report. Remember, you need not complete all modules to use the model -- you may use as many, or as few, as you like. Note that the Model has been designed to provide you with the flexibility to forecast future costs based on current resource needs, inflation, and expected program growth. You may print individual worksheets by clicking on the printer icon found on the Excel toolbar at the top of your screen.

**NOTE:** Before you begin using the Model, please review and adjust the base assumptions presented below. These assumptions cut across all 14 modules and therefore will greatly impact the final calculations of State need.

### State Information -- MUST BE ENTERED TO USE MODEL

State Name: 

- Select State -
Alabama
Alaska
Arizona
Arkansas

Region: 

Select State
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### Parameters for State Personnel

Hours per FTE-year: <sup>1</sup>	1,800
Annual cost per FTE (fully-loaded): <sup>2</sup>	\$70,000
Annual salary adjustment for inflation:	3.00%
Additional annual salary adjustment to ensure staff retention:	0.00%
Total annual salary adjustment:	3.00%

1. The value entered for hours per FTE-year should only include hours worked. For example, assuming 8 hours per workday, there are 2,080 available hours in a year. To get "hours worked," deduct the hours allowed by your agency for sick, holiday, vacation, and personal leave from the total available hours. The default estimate is based on the assumption that there are 280 hours of sick, holiday, vacation, and personal leave available to employees each year. You should modify this value to reflect the reality in your State.
2. In addition to direct labor costs, the value entered into this cell should reflect the cost of fringe benefits (e.g., health coverage; vacation, sick, and holiday time; etc.), general training, and indirect expenses such as professional support (e.g., administration, accounting, clerical, etc.), office space, utilities, telephone service, copiers, fax machines, and basic computing needs (hardware and software). However, this value should not include the costs associated with computer maintenance, support, or periodic hardware or software upgrades. These costs are covered in the Data Management module.

## **Main Menu**

### **Modules**

**NOTE:** The first four modules fall under the umbrella of the Point Source Control Program in many States. Thus, these modules rely on much of the same facility data. Therefore, please access the supplementary Point Source Assumptions worksheet prior to activating the "Permitting," "Compliance," "Enforcement," or "Septage" buttons.

<b>Point Source Assumptions</b>	-- Accesses the assumptions used in the Permitting, Compliance, Enforcement and Septage modules. Click here <i>before</i> accessing any of these four modules.
Permitting	-- Point source program planning, mgmt., oversight; rule and guidance development, review, and revision; individual NPDES permits, CWA 316 reviews, and general permits. Also covers SW and CAFOs.
Compliance	-- DMR review; inspections of individual and general permittees -- including NPDES facilities, CAFOs, CSOs, SSOs, POTWs, and biosolid application sites; sampling necessary to support compliance activities.
Enforcement	-- Complaint investigations (regulated and unregulated facilities) and violation response -- from telephone calls and NOVs to civil and criminal referrals and post-referral follow-up.
Septage	-- Certification and regulation of septage haulers; certification and review of application sites; compliance and enforcement activities for the septage program.

NPS and Coastal NPS	-- Planning State NPS, coastal NPS, and clean lake strategies, ongoing rule and guidance development, NPS, coastal NPS, and clean lake project management, local coordination of NPS activities, contract and grant management.
TMDL Development	-- Planning State TMDL strategy, watershed characterization, TMDL development, tracking TMDL implementation, legal support, and TMDL-specific contract procurement and management.
Wetlands	-- Planning and coordination for the wetlands program, ongoing rule and guidance development, development of wetland-specific WQ standards, permitting activities, certification and training programs.
Coastal and Marine	-- Rule and guidance development, review, and revision; Coastal Monitoring Program, no-discharge zones, invasive species control, National Estuary Program (CCMP development and implementation).
Monitoring	-- Planning, coordination, and implementation of all water quality monitoring necessary to support the complete spectrum of State water quality programs [e.g., CWA 305(b) water quality assessments, TMDL development, etc.]; includes ambient, sediment, biological, and habitat monitoring for all waterbodies (streams, lakes, coastal and marine waters, and wetlands); State support of the National Air Deposition Network (NADN).
Reporting & Planning	-- Reviewing regulations and guidance for CWA 303(d) and 305(b), planning and coordinating data acquisition and assessment, report preparation and submission; CWA planning activities: CPPs/WQMPs.
Water Quality Standards	-- Developing and implementing water quality standards for all waterbodies except wetlands.
CWSRF & Grant Mgmt.	-- CWSRF and construction grant management; tracking and management of program grants and cooperative agreements, project grants, and performance partnership grant (PPG).
Data Management	-- Data processing, data system maintenance and improvement, geographic information system (GIS) management, web-site development and maintenance, One-Stop Reporting Program.
Regional Initiatives	-- Gulf of Mexico Program, Mississippi River Program, Great Lakes Program, Chesapeake Bay Program, and U.S.-Mexico Border Programs.

### **Summary Reports**

Click on one of the buttons below to access the needs summary for the specified module.

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-- Presents a summary of State FTE and dollar needs for all 14 modules based on your inputs.

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**REPORTING and PLANNING MODULE -- Current Need**

STATE: **Select State**  
 REGION: **Select State**

Activity	Unit of Analysis	Units per Year	Required Annual Effort (FTE hrs/unit)	Total Required Effort (FTE hrs/year)	Total Annual Costs for Line-Item (\$/yr)
1. Review Regulations and Guidance for CWA 305(b) and CWA 303(d)	Annual	1	80	80	\$3,111
2. Plan and Coordinate Data Acquisition and Compile and Screen Data for Assessments <sup>1</sup>	Annual	1	1,000	1,000	\$38,889
<b>3. Develop/Update Consolidated Assessment and Listing Methodology</b>	<b>Annual</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>\$0</b>
4. Development and Submission of Complete 305(b) Report and Response to EPA Comments <sup>2</sup>	<b>Annual</b>	<b>1</b>	<b>1,000</b>	<b>1,000</b>	<b>\$38,889</b>
5. Prepare 303(d) List <sup>3</sup>	Annual	1	2,400	2,400	\$93,333
<b>OR -- In Lieu of 4&amp;5 Above -- Development of Integrated 303(d) List/305(b) Report</b>					
6. Public Participation					
A. Required public outreach for 303(d) list <sup>4</sup>	Annual	1	240	240	\$9,333
B. "Optional" additional public outreach for 303(d) list and 305(b) document <sup>5</sup> (add-on)	Annual	1	448	448	\$17,422
7. Submission of 303(d) List to EPA and Response to EPA Comments	Annual	1	200	200	\$7,778
8. Prepare Annual Electronic Updates <sup>6</sup>	Annual	1	240	240	\$9,333
9. Reporting for 319 -- annual report and program assessment	Annual	1	1,000	1,000	\$38,889
10. Continuing Planning Process (CPP) / Water Quality Management Plans (WQMPs)					
A. Review and update of Regional, State, and/or basin WQMPs <sup>7</sup>	Update	11	400	4,400	\$171,111
B. Certification of consistency of WQMP updates <sup>8</sup>	Annual	1	100	100	\$3,889
C. Maintain and update CPP <sup>9</sup>	Annual	1	600	600	\$23,333
D. Maintain and update implementation procedures <sup>10</sup>	Update	2	400	800	\$31,111
<b>11. Litigation costs associated with 303(d) list</b>	<b>Annual</b>	<b>1</b>	<b>0</b>	<b>0</b>	<b>\$0</b>
12. State-Specific Reporting and Planning Activities <sup>11</sup>				0	\$0
<b>TOTAL Annual Workload Associated with Reporting and Program Planning Activities</b>				<b>12,508</b>	<b>\$486,422</b>

**Total FTEs: 6.9**



### **Notes for Reporting and Planning Module**

- 1 Workload for the following activities should be reflected in the estimate for the data acquisition line item: planning data acquisition strategy; issuing solicitation for data from other agencies, universities, the public, etc.; developing data screening programs; gathering and compiling appropriate data; and determining the availability of sufficient data.
2. The workload estimate for the development of 305(b) report should cover internal circulation, review, and revision of all aspects of the report prior to submission to EPA. Since States are required to submit information regarding the ability of each individual waterbody (including rivers and streams, lakes, estuaries, wetlands, and coastal and marine waters) to meet its designated use, the resources needed to complete each section of the report must be reflected in this line item.
3. Preparation of the 303(d) list includes the following tasks: identifying waters (including wetlands and coastal and marine waters), establishing priorities, and determining schedules and targets.
4. The CWA stipulates that the public must be provided with the opportunity to participate in the development of a State's 303(d) list. Therefore, the workload estimate for this activity should reflect the resource needs associated with the issuance of public notice(s) and the development of responses to public comments on the list, priorities, and schedules.
5. "Optional" public outreach covers the many and varied State outreach activities that are not required under the CWA [e.g., communication with watershed advisory groups, distribution of educational materials, etc.]. The focus group voiced their belief that these optional activities can greatly enhance public understanding and smooth the reporting process. For this reason, this activity was priced as an add-on based on the costs associated with activities 1 through 5.  
Size of "optional" public outreach add-on: 10%
6. This activity includes inputting geo-referenced assessment findings into the Assessment Database (or a compatible format) and submitting that database to EPA on an annual
7. Water quality management plans (WQMPs) should be reviewed and updated as needed to reflect changing water quality conditions, results of implementation actions, new requirements, or to remove conditions in prior partial or conditional plan approvals.
8. The State must ensure that area-wide and State WQMPs are consistent with one another, and shall certify for EPA approval that WQMP updates are consistent with all other parts of the plan. This certification may be included in the annual State work program.
9. The continuing planning process must address a number of regulatory processes in order to continue to achieve approval from Regional Administrators that the CPP is consistent with CWA requirements. The CPP must adequately describe the process for: developing effluent limitations and schedules of compliance as required; incorporating elements of any applicable area-wide waste treatment plans and basin plans; developing TMDLs and individual water quality based effluent limitations in accordance with 303(d); updating and maintaining WQMPs, including schedules for revision; assuring adequate authority for intergovernmental cooperation in the implementation of the State WQM program; establishing and assuring implementation of new water quality standards, including schedules of compliance; assuring adequate controls over the disposition of all residual waste from any water treatment processing; developing the priority POTW construction needs list; and determining the priority of permit issuance.
10. Implementation of the WQMP requires the cooperation and coordination of a large number of different agencies—EPA, States, interstate agencies, regional governments, local governments, and other sub-State entities, and the WQMP should specify how these various agencies will work together. Roles and responsibilities will change over time. When
11. The costs associated with litigation concerning the State 303(d) list should be included in your estimate for this line item.

**REPORTING and PLANNING MODULE -- Year 2 Need**

STATE: **Select State**  
 REGION: **Select State**

Activity	Unit of Analysis	Units per Year	Required Annual Effort (FTE hrs/unit)	Total Required Effort (FTE hrs/year)	Total Annual Costs for Line-Item (\$/yr)
1. Review Regulations and Guidance for CWA 305(b) and CWA 303(d)	Annual	1	80	80	\$3,204
2. Plan and Coordinate Data Acquisition and Compile and Screen Data for Assessments <sup>1</sup>	Annual	1	1,000	1,000	\$40,056
<b>3. Develop/Update Consolidated Assessment and Listing Methodology</b>	Annual	1	0	0	\$0
4. Development and Submission of Complete 305(b) Report and Response to EPA Comments <sup>2</sup>	Annual	1	1,000	1,000	\$40,056
5. Prepare 303(d) List <sup>3</sup>	Annual	1	2,400	2,400	\$96,133
<b>OR -- In Lieu of 4&amp;5 Above -- Development of Integrated 303(d) List/305(b) Report</b>					
6. Public Participation					
A. Required public outreach for 303(d) list <sup>4</sup>	Annual	1	240	240	\$9,613
B. "Optional" additional public outreach for 303(d) list and 305(b) document <sup>5</sup> (add-on)	Annual	1	448	448	\$17,945
7. Submission of 303(d) List to EPA and Response to EPA Comments	Annual	1	200	200	\$8,011
8. Prepare Annual Electronic Updates <sup>6</sup>	Annual	1	240	240	\$9,613
9. Reporting for 319 -- annual report and program assessment	Annual	1	1,000	1,000	\$40,056
10. Continuing Planning Process (CPP) / Water Quality Management Plans (WQMPs)					
A. Review and update of Regional, State, and/or basin WQMPs <sup>7</sup>	Update	11	400	4,400	\$176,244
B. Certification of consistency of WQMP updates <sup>8</sup>	Annual	1	100	100	\$4,006
C. Maintain and update CPP <sup>9</sup>	Annual	1	600	600	\$24,033
D. Maintain and update implementation procedures <sup>10</sup>	Update	2	400	800	\$32,044
<b>11. Litigation costs associated with 303(d) list</b>		1	0	0	\$0
12. State-Specific Reporting and Planning Activities <sup>11</sup>				0	\$0
<b>TOTAL Annual Workload Associated with Reporting and Program Planning Activities</b>				<b>12,508</b>	<b>\$501,015</b>

**Total FTEs: 6.9**

### **Notes for Reporting and Planning Module**

- 1 Workload for the following activities should be reflected in the estimate for the data acquisition line item: planning data acquisition strategy; issuing solicitation for data from other agencies, universities, the public, etc.; developing data screening programs; gathering and compiling appropriate data; and determining the availability of sufficient data.
2. The workload estimate for the development of 305(b) report should cover internal circulation, review, and revision of all aspects of the report prior to submission to EPA. Since States are required to submit information regarding the ability of each individual waterbody (including rivers and streams, lakes, estuaries, wetlands, and coastal and marine waters) to meet its designated use, the resources needed to complete each section of the report must be reflected in this line item.
3. Preparation of the 303(d) list includes the following tasks: identifying waters (including wetlands and coastal and marine waters), establishing priorities, and determining schedules and targets.
4. The CWA stipulates that the public must be provided with the opportunity to participate in the development of a State's 303(d) list. Therefore, the workload estimate for this activity should reflect the resource needs associated with the issuance of public notice(s) and the development of responses to public comments on the list, priorities, and schedules.
5. "Optional" public outreach covers the many and varied State outreach activities that are not required under the CWA [e.g., communication with watershed advisory groups, distribution of educational materials, etc.]. The focus group voiced their belief that these optional activities can greatly enhance public understanding and smooth the reporting process. For this reason, this activity was priced as an add-on based on the costs associated with activities 1 through 5.  
Size of "optional" public outreach add-on: 10%
6. This activity includes inputting geo-referenced assessment findings into the Assessment Database (or a compatible format) and submitting that database to EPA on an annual
7. Water quality management plans (WQMPs) should be reviewed and updated as needed to reflect changing water quality conditions, results of implementation actions, new requirements, or to remove conditions in prior partial or conditional plan approvals.
8. The State must ensure that area-wide and State WQMPs are consistent with one another, and shall certify for EPA approval that WQMP updates are consistent with all other parts of the plan. This certification may be included in the annual State work program.
9. The continuing planning process must address a number of regulatory processes in order to continue to achieve approval from Regional Administrators that the CPP is consistent with CWA requirements. The CPP must adequately describe the process for: developing effluent limitations and schedules of compliance as required; incorporating elements of any applicable area-wide waste treatment plans and basin plans; developing TMDLs and individual water quality based effluent limitations in accordance with 303(d); updating and maintaining WQMPs, including schedules for revision; assuring adequate authority for intergovernmental cooperation in the implementation of the State WQM program; establishing and assuring implementation of new water quality standards, including schedules of compliance; assuring adequate controls over the disposition of all residual waste from any water treatment processing; developing the priority POTW construction needs list; and determining the priority of permit issuance.
10. Implementation of the WQMP requires the cooperation and coordination of a large number of different agencies—EPA, States, interstate agencies, regional governments, local governments, and other sub-State entities, and the WQMP should specify how these various agencies will work together. Roles and responsibilities will change over time. When
11. The costs associated with litigation concerning the State 303(d) list should be included in your estimate for this line item.

**REPORTING and PLANNING MODULE -- Year 3 Need**

STATE: **Select State**  
 REGION: **Select State**

Activity	Unit of Analysis	Units per Year	Required Annual Effort (FTE hrs/unit)	Total Required Effort (FTE hrs/year)	Total Annual Costs for Line-Item (\$/yr)
1. Review Regulations and Guidance for CWA 305(b) and CWA 303(d)	Annual	1	80	80	\$3,301
2. Plan and Coordinate Data Acquisition and Compile and Screen Data for Assessments <sup>1</sup>	Annual	1	1,000	1,000	\$41,257
<b>3. Develop/Update Consolidated Assessment and Listing Methodology</b>	Annual	1	0	0	\$0
4. Development and Submission of Complete 305(b) Report and Response to EPA Comments <sup>2</sup>	Annual	1	1,000	1,000	\$41,257
5. Prepare 303(d) List <sup>3</sup>	Annual	1	2,400	2,400	\$99,017
<b>OR -- In Lieu of 4&amp;5 Above -- Development of Integrated 303(d) List/305(b) Report</b>					
6. Public Participation					
A. Required public outreach for 303(d) list <sup>4</sup>	Annual	1	240	240	\$9,902
B. "Optional" additional public outreach for 303(d) list and 305(b) document <sup>5</sup> (add-on)	Annual	1	448	448	\$18,483
7. Submission of 303(d) List to EPA and Response to EPA Comments	Annual	1	200	200	\$8,251
8. Prepare Annual Electronic Updates <sup>6</sup>	Annual	1	240	240	\$9,902
9. Reporting for 319 -- annual report and program assessment	Annual	1	1,000	1,000	\$41,257
10. Continuing Planning Process (CPP) / Water Quality Management Plans (WQMPs)					
A. Review and update of Regional, State, and/or basin WQMPs <sup>7</sup>	Update	11	400	4,400	\$181,532
B. Certification of consistency of WQMP updates <sup>8</sup>	Annual	1	100	100	\$4,126
C. Maintain and update CPP <sup>9</sup>	Annual	1	600	600	\$24,754
D. Maintain and update implementation procedures <sup>10</sup>	Update	2	400	800	\$33,006
<b>11. Litigation costs associated with 303(d) list</b>		1	0	0	\$0
12. State-Specific Reporting and Planning Activities <sup>11</sup>				0	\$0
<b>TOTAL Annual Workload Associated with Reporting and Program Planning Activities</b>				<b>12,508</b>	<b>\$516,045</b>

**Total FTEs: 6.9**

**Notes for Reporting and Planning Module**

1. Workload for the following activities should be reflected in the estimate for the data acquisition line item: planning data acquisition strategy; issuing solicitation for data from other agencies, universities, the public, etc.; developing data screening programs; gathering and compiling appropriate data; and determining the availability of sufficient data.
2. The workload estimate for the development of 305(b) report should cover internal circulation, review, and revision of all aspects of the report prior to submission to EPA. Since States are required to submit information regarding the ability of each individual waterbody (including rivers and streams, lakes, estuaries, wetlands, and coastal and marine waters) to meet its designated use, the resources needed to complete each section of the report must be reflected in this line item.
3. Preparation of the 303(d) list includes the following tasks: identifying waters (including wetlands and coastal and marine waters), establishing priorities, and determining schedules and targets.
4. The CWA stipulates that the public must be provided with the opportunity to participate in the development of a State's 303(d) list. Therefore, the workload estimate for this activity should reflect the resource needs associated with the issuance of public notice(s) and the development of responses to public comments on the list, priorities, and schedules.
5. "Optional" public outreach covers the many and varied State outreach activities that are not required under the CWA [e.g., communication with watershed advisory groups, distribution of educational materials, etc.]. The focus group voiced their belief that these optional activities can greatly enhance public understanding and smooth the reporting process. For this reason, this activity was priced as an add-on based on the costs associated with activities 1 through 5.  
Size of "optional" public outreach add-on: 10%
6. This activity includes inputting geo-referenced assessment findings into the Assessment Database (or a compatible format) and submitting that database to EPA on an annual
7. Water quality management plans (WQMPs) should be reviewed and updated as needed to reflect changing water quality conditions, results of implementation actions, new requirements, or to remove conditions in prior partial or conditional plan approvals.
8. The State must ensure that area-wide and State WQMPs are consistent with one another, and shall certify for EPA approval that WQMP updates are consistent with all other parts of the plan. This certification may be included in the annual State work program.
9. The continuing planning process must address a number of regulatory processes in order to continue to achieve approval from Regional Administrators that the CPP is consistent with CWA requirements. The CPP must adequately describe the process for: developing effluent limitations and schedules of compliance as required; incorporating elements of any applicable area-wide waste treatment plans and basin plans; developing TMDLs and individual water quality based effluent limitations in accordance with 303(d); updating and maintaining WQMPs, including schedules for revision; assuring adequate authority for intergovernmental cooperation in the implementation of the State WQM program; establishing and assuring implementation of new water quality standards, including schedules of compliance; assuring adequate controls over the disposition of all residual waste from any water treatment processing; developing the priority POTW construction needs list; and determining the priority of permit issuance.
10. Implementation of the WQMP requires the cooperation and coordination of a large number of different agencies—EPA, States, interstate agencies, regional governments, local governments, and other sub-State entities, and the WQMP should specify how these various agencies will work together. Roles and responsibilities will change over time. When
11. The costs associated with litigation concerning the State 303(d) list should be included in your estimate for this line item.

**REPORTING and PLANNING MODULE -- Year 4 Need**

STATE: **Select State**  
 REGION: **Select State**

Activity	Unit of Analysis	Units per Year	Required Annual Effort (FTE hrs/unit)	Total Required Effort (FTE hrs/year)	Total Annual Costs for Line-Item (\$/yr)
1. Review Regulations and Guidance for CWA 305(b) and CWA 303(d)	Annual	1	80	80	\$3,400
2. Plan and Coordinate Data Acquisition and Compile and Screen Data for Assessments <sup>1</sup>	Annual	1	1,000	1,000	\$42,495
<b>3. Develop/Update Consolidated Assessment and Listing Methodology</b>	Annual	1	0	0	\$0
4. Development and Submission of Complete 305(b) Report and Response to EPA Comments <sup>2</sup>	Annual	1	1,000	1,000	\$42,495
5. Prepare 303(d) List <sup>3</sup>	Annual	1	2,400	2,400	\$101,988
<b>OR -- In Lieu of 4&amp;5 Above -- Development of Integrated 303(d) List/305(b) Report</b>					
6. Public Participation					
A. Required public outreach for 303(d) list <sup>4</sup>	Annual	1	240	240	\$10,199
B. "Optional" additional public outreach for 303(d) list and 305(b) document <sup>5</sup> (add-on)	Annual	1	448	448	\$19,038
7. Submission of 303(d) List to EPA and Response to EPA Comments	Annual	1	200	200	\$8,499
8. Prepare Annual Electronic Updates <sup>6</sup>	Annual	1	240	240	\$10,199
9. Reporting for 319 -- annual report and program assessment	Annual	1	1,000	1,000	\$42,495
10. Continuing Planning Process (CPP) / Water Quality Management Plans (WQMPs)					
A. Review and update of Regional, State, and/or basin WQMPs <sup>7</sup>	Update	11	400	4,400	\$186,978
B. Certification of consistency of WQMP updates <sup>8</sup>	Annual	1	100	100	\$4,249
C. Maintain and update CPP <sup>9</sup>	Annual	1	600	600	\$25,497
D. Maintain and update implementation procedures <sup>10</sup>	Update	2	400	800	\$33,996
<b>11. Litigation costs associated with 303(d) list</b>		1	0	0	\$0
12. State-Specific Reporting and Planning Activities <sup>11</sup>				0	\$0
<b>TOTAL Annual Workload Associated with Reporting and Program Planning Activities</b>				<b>12,508</b>	<b>\$531,527</b>

**Total FTEs: 6.9**

**Notes for Reporting and Planning Module**

1. Workload for the following activities should be reflected in the estimate for the data acquisition line item: planning data acquisition strategy; issuing solicitation for data from other agencies, universities, the public, etc.; developing data screening programs; gathering and compiling appropriate data; and determining the availability of sufficient data.
2. The workload estimate for the development of 305(b) report should cover internal circulation, review, and revision of all aspects of the report prior to submission to EPA. Since States are required to submit information regarding the ability of each individual waterbody (including rivers and streams, lakes, estuaries, wetlands, and coastal and marine waters) to meet its designated use, the resources needed to complete each section of the report must be reflected in this line item.
3. Preparation of the 303(d) list includes the following tasks: identifying waters (including wetlands and coastal and marine waters), establishing priorities, and determining schedules and targets.
4. The CWA stipulates that the public must be provided with the opportunity to participate in the development of a State's 303(d) list. Therefore, the workload estimate for this activity should reflect the resource needs associated with the issuance of public notice(s) and the development of responses to public comments on the list, priorities, and schedules.
5. "Optional" public outreach covers the many and varied State outreach activities that are not required under the CWA [e.g., communication with watershed advisory groups, distribution of educational materials, etc.]. The focus group voiced their belief that these optional activities can greatly enhance public understanding and smooth the reporting process. For this reason, this activity was priced as an add-on based on the costs associated with activities 1 through 5.  
Size of "optional" public outreach add-on: 10%
6. This activity includes inputting geo-referenced assessment findings into the Assessment Database (or a compatible format) and submitting that database to EPA on an annual
7. Water quality management plans (WQMPs) should be reviewed and updated as needed to reflect changing water quality conditions, results of implementation actions, new requirements, or to remove conditions in prior partial or conditional plan approvals.
8. The State must ensure that area-wide and State WQMPs are consistent with one another, and shall certify for EPA approval that WQMP updates are consistent with all other parts of the plan. This certification may be included in the annual State work program.
9. The continuing planning process must address a number of regulatory processes in order to continue to achieve approval from Regional Administrators that the CPP is consistent with CWA requirements. The CPP must adequately describe the process for: developing effluent limitations and schedules of compliance as required; incorporating elements of any applicable area-wide waste treatment plans and basin plans; developing TMDLs and individual water quality based effluent limitations in accordance with 303(d); updating and maintaining WQMPs, including schedules for revision; assuring adequate authority for intergovernmental cooperation in the implementation of the State WQM program; establishing and assuring implementation of new water quality standards, including schedules of compliance; assuring adequate controls over the disposition of all residual waste from any water treatment processing; developing the priority POTW construction needs list; and determining the priority of permit issuance.
10. Implementation of the WQMP requires the cooperation and coordination of a large number of different agencies—EPA, States, interstate agencies, regional governments, local governments, and other sub-State entities, and the WQMP should specify how these various agencies will work together. Roles and responsibilities will change over time. When
11. The costs associated with litigation concerning the State 303(d) list should be included in your estimate for this line item.

**REPORTING and PLANNING MODULE -- Year 5 Need**

STATE: **Select State**  
 REGION: **Select State**

Activity	Unit of Analysis	Units per Year	Required Annual Effort (FTE hrs/unit)	Total Required Effort (FTE hrs/year)	Total Annual Costs for Line-Item (\$/yr)
1. Review Regulations and Guidance for CWA 305(b) and CWA 303(d)	Annual	1	80	80	\$3,502
2. Plan and Coordinate Data Acquisition and Compile and Screen Data for Assessments <sup>1</sup>	Annual	1	1,000	1,000	\$43,770
<b>3. Develop/Update Consolidated Assessment and Listing Methodology</b>	Annual	1	0	0	\$0
4. Development and Submission of Complete 305(b) Report and Response to EPA Comments <sup>2</sup>	Annual	1	1,000	1,000	\$43,770
5. Prepare 303(d) List <sup>3</sup>	Annual	1	2,400	2,400	\$105,047
<b>OR -- In Lieu of 4&amp;5 Above -- Development of Integrated 303(d) List/305(b) Report</b>					
6. Public Participation					
A. Required public outreach for 303(d) list <sup>4</sup>	Annual	1	240	240	\$10,505
B. "Optional" additional public outreach for 303(d) list and 305(b) document <sup>5</sup> (add-on)	Annual	1	448	448	\$19,609
7. Submission of 303(d) List to EPA and Response to EPA Comments	Annual	1	200	200	\$8,754
8. Prepare Annual Electronic Updates <sup>6</sup>	Annual	1	240	240	\$10,505
9. Reporting for 319 -- annual report and program assessment	Annual	1	1,000	1,000	\$43,770
10. Continuing Planning Process (CPP) / Water Quality Management Plans (WQMPs)					
A. Review and update of Regional, State, and/or basin WQMPs <sup>7</sup>	Update	11	400	4,400	\$192,587
B. Certification of consistency of WQMP updates <sup>8</sup>	Annual	1	100	100	\$4,377
C. Maintain and update CPP <sup>9</sup>	Annual	1	600	600	\$26,262
D. Maintain and update implementation procedures <sup>10</sup>	Update	2	400	800	\$35,016
<b>11. Litigation costs associated with 303(d) list</b>		1	0	0	\$0
12. State-Specific Reporting and Planning Activities <sup>11</sup>				0	\$0
<b>TOTAL Annual Workload Associated with Reporting and Program Planning Activities</b>				<b>12,508</b>	<b>\$547,472</b>

**Total FTEs: 6.9**



### **Notes for Reporting and Planning Module**

- 1 Workload for the following activities should be reflected in the estimate for the data acquisition line item: planning data acquisition strategy; issuing solicitation for data from other agencies, universities, the public, etc.; developing data screening programs; gathering and compiling appropriate data; and determining the availability of sufficient data.
2. The workload estimate for the development of 305(b) report should cover internal circulation, review, and revision of all aspects of the report prior to submission to EPA. Since States are required to submit information regarding the ability of each individual waterbody (including rivers and streams, lakes, estuaries, wetlands, and coastal and marine waters) to meet its designated use, the resources needed to complete each section of the report must be reflected in this line item.
3. Preparation of the 303(d) list includes the following tasks: identifying waters (including wetlands and coastal and marine waters), establishing priorities, and determining schedules and targets.
4. The CWA stipulates that the public must be provided with the opportunity to participate in the development of a State's 303(d) list. Therefore, the workload estimate for this activity should reflect the resource needs associated with the issuance of public notice(s) and the development of responses to public comments on the list, priorities, and schedules.
5. "Optional" public outreach covers the many and varied State outreach activities that are not required under the CWA [e.g., communication with watershed advisory groups, distribution of educational materials, etc.]. The focus group voiced their belief that these optional activities can greatly enhance public understanding and smooth the reporting process. For this reason, this activity was priced as an add-on based on the costs associated with activities 1 through 5.  
Size of "optional" public outreach add-on: 10%
6. This activity includes inputting geo-referenced assessment findings into the Assessment Database (or a compatible format) and submitting that database to EPA on an annual
7. Water quality management plans (WQMPs) should be reviewed and updated as needed to reflect changing water quality conditions, results of implementation actions, new requirements, or to remove conditions in prior partial or conditional plan approvals.
8. The State must ensure that area-wide and State WQMPs are consistent with one another, and shall certify for EPA approval that WQMP updates are consistent with all other parts of the plan. This certification may be included in the annual State work program.
9. The continuing planning process must address a number of regulatory processes in order to continue to achieve approval from Regional Administrators that the CPP is consistent with CWA requirements. The CPP must adequately describe the process for: developing effluent limitations and schedules of compliance as required; incorporating elements of any applicable area-wide waste treatment plans and basin plans; developing TMDLs and individual water quality based effluent limitations in accordance with 303(d); updating and maintaining WQMPs, including schedules for revision; assuring adequate authority for intergovernmental cooperation in the implementation of the State WQM program; establishing and assuring implementation of new water quality standards, including schedules of compliance; assuring adequate controls over the disposition of all residual waste from any water treatment processing; developing the priority POTW construction needs list; and determining the priority of permit issuance.
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11. The costs associated with litigation concerning the State 303(d) list should be included in your estimate for this line item.